

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ANTHONY MITCHELL,

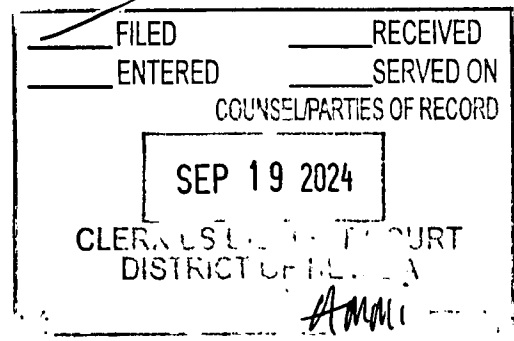
Plaintiff,

v.

RYAN COHEN, an individual;
ROBINHOOD FINANCIAL LLC, a
Delaware Limited Liability Company;
ROBINHOOD SECURITIES, LLC, a
Delaware Limited Liability Company;
ROBINHOOD MONEY, LLC, a Delaware
Limited Liability Company; THE
DEPOSITORY TRUST & CLEARING
CORPORATION, a New York Corporation;
20230930-DK-BUTTERFLY-1, INC., a New
York Corporation doing business as BED
BATH & BEYOND; OVERSTOCK.COM,
INC., a Delaware Corporation doing business
as BED BATH & BEYOND; RC
VENTURES LLC, a Delaware Limited
Liability Company; SUE E. GOVE, an
individual,

Defendants.

Case No. 2:24-cv-01042



**PLAINTIFF'S OPPOSITION TO DEFENDANT BEYOND, INC.'S (F/K/A
OVERSTOCK.COM, INC.) MOTION TO DISMISS PLAINTIFF'S COMPLAINT AND,
IN THE ALTERNATIVE, MOTION TO TRANSFER**

COMES NOW Plaintiff Anthony Mitchel (hereafter referred to as "Plaintiff"), to submit his Opposition to Defendant Overstock.com, Inc. ("Overstock" or "Defendant")'s Motion to Dismiss Plaintiff's Complaint and, in the alternative, Motion to transfer ("Motion") and

respectfully requests this Honorable Court to deny Defendant's Motion. In support, Plaintiff submits the accompany Memorandum of Points and Authorities.

Dated: September 16, 2024

Respectfully submitted,


ANTHONY MITCHELL, Pro se

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PLAINTIFF'S MEMORANDUM OF POINTS AND AUTHORITIES
IN OPPOSITION TO DEFENDANT'S MOTION TO DISMISS

I. PRELIMINARY STATEMENT

Plaintiff objects to Defendant's Motion to Dismiss because Defendant has notice of the original complaint, and the alleged defect in service (if any) is technical, the failure to properly serve the original complaint is justifiable, and Plaintiff could be severely prejudiced if his complaint is dismissed without prejudice.

Plaintiff further objects to Defendant's Motion to Dismiss because Dismissal of a complaint is inappropriate when there exists a reasonable prospect that service may yet be obtained. If the Court decides that the service was not proper, Plaintiff asks to provide him with the opportunity to serve the Defendant. There is nothing in the record to indicate that proper service is impossible to effectuate.

Plaintiff further objects to Defendant's Motion to Dismiss because the New Jersey Bankruptcy Court does not have jurisdiction over Plaintiff. Plaintiff is not a party of the agreement nor participated in the bankruptcy proceeding. More importantly, this dispute does not relate to the terms and provisions of the Sale order and the asset purchase agreement.

Plaintiff finally objects to Defendant's Motion to Dismiss because this case is not a bankruptcy case under title 11, accordingly 28 U.S.C. § 1412 is not applicable here. Thus, the transfer to the Bankruptcy court should be denied.

II. FACTUAL BACKGROUND

Plaintiff filed the present complaint against Overstock for Unjust Enrichment. The complaint in the relevant part states that after Bed Bath and Beyond was removed from the

NYSE stock market - Overstock.com changed its name to Beyond Inc. and adopted the Bed Bath & Beyond logo and website bedbathandbeyond.com. Overstock.com continued to sell shares of Bed Bath & Beyond. Defendant Overstock.com unjustly enriched itself by wrongfully converting, taking, utilizing or managing the property and financial interests of Plaintiff. (Complaint at ¶¶ 95, 97).

Upon information and belief, Overstock's address for service is 12670 High Bluff Dr, San Diego, CA. Plaintiff hired a process server ABC Legal for service of the Defendant.

On or about August 7, 2024, Overstock was served. A true and correct copy of service attempts is attached as **Exhibit A**. Here is the process server's note:

By delivery to Spencer Doe, I delivered the documents to an individual who refused to give their name who identified themselves as the person authorized to accept. The individual accepted service with direct delivery. The individual appeared to be a black haired white male contact 35-45 years of age, 5'10"-6'0" tall and weighing 180-200 lbs.

On September 11, 2024, Defendant moved to dismiss for insufficiency of service of process and improper venue. Alternatively, Defendant asks the court to transfer the case to the District of New Jersey. Dkt. 18.

III. ARGUMENT

A. Defendant's argument that the complaint should be dismissed for improper service is meritless.

In some instances, Rule 4 may be liberally construed "so long as the opposing party receives sufficient notice of the complaint." *United Food & Commercial Workers Union v. Alpha Beta Co.*, 736 F.2d 1371, 1382 (9th Cir. 1984). The Ninth Circuit has held that failure to comply with service requirements does not warrant dismissal if: "(a) the party that had to be served

personally received actual notice, (b) the defendant would suffer no prejudice from the defect in service, (c) there is a justifiable excuse for the failure to serve properly, and (d) the plaintiff would be severely prejudiced if his complaint were dismissed." *Borzeka v. Heckler*, 739 F.2d 444, 447 (9th Cir. 1984).

Moreover, under the Ninth Circuit's four-part test, even if Plaintiff failed to comply with service requirements, it does not warrant dismissal. *Hamilton*, 981 F.2d at 1065. Defendant has notice of the original complaint, and the alleged defect in service (if any) is technical, the failure to properly serve the original complaint is justifiable, and Plaintiff could be severely prejudiced if his complaint is dismissed without prejudice. Therefore, the Court should deny Defendant's motion as to the remedy of dismissing Plaintiff's complaint.

B. If the Court decides that the service was not proper, Plaintiff asks to provide him the opportunity to serve the Defendant.

If the Court decides not to dismiss, it quashes the ineffective service that has been made on the defendant and provides the plaintiff the opportunity to serve the defendant again effectively. See *Stevens v. Security Pacific Nat'l Bank*, 538 F.2d 1387, 1389 (9th Cir. 1976). See also *S.J. v. Issaquah Sch.* Dist. No. 411, 470 F. 3d 1288, 1293 (9th Cir. 2006) (noting that "even if service were insufficient—on which we express no opinion—we could not simply affirm dismissal because the district court has discretion to dismiss an action or to quash service"). "Dismissal of a complaint is inappropriate when there exists a reasonable prospect that service may yet be obtained. In such instances, the district court should, at most, quash service, leaving the plaintiffs free to effect proper service." *Arasan Chip Sys., Inc. v. Sonix Tech. Co. Ltd.*, No. 509-CV-02172 JF PVT, 2010 WL 890424, at *1 (N.D. Cal. Mar. 8, 2010) (internal

quotation omitted). Lasswell Found. for Learning & Laughter, Inc. v. Schwartz, Case No.: 3:16-cv-00497-BEN-WVG, 4 (S.D. Cal. Nov. 4, 2016).

Alternatively, if the Court decides that the service was not proper, Plaintiff asks to provide him with the opportunity to serve the Defendant. There is nothing in the record to indicate that proper service is impossible to effectuate. Thus, the Court should not dismiss the complaint for ineffective service.

C. Venue is proper.

28 U.S. Code § 1391(b) in relevant part states that a civil action may be brought in ... (2) a judicial district in which a substantial part of the events or omissions giving rise to the claim occurred, or a substantial part of property that is the subject of the action is situated. The complaint states that the acts and conduct that constitute the violations of law complained occurred in substantial part in this District, including the dissemination of materially misleading information on the Internet that was accessible in this District. Moreover, Plaintiff purchased the shares of Bed Bath stock in this District. Accordingly, the venue is proper since the substantial part of events had occurred in this district.

Defendant alleges that the venue is instead proper in the District of New Jersey because the Bankruptcy Court for the District of New Jersey retained exclusive jurisdiction over claims relating to Beyond's purchase of Bed Bath & Beyond Inc.'s intellectual property. The bankruptcy court order Dkt No.1117 in Paragraph 38 states that the bankruptcy Court shall retain exclusive jurisdiction with respect to the terms and provisions of the Sale Order and the Stalking Horse Purchase Agreement (Asset purchase agreement between Bed Bath and Overstock). Plaintiff is not a party of the agreement nor participated in the bankruptcy proceeding. More importantly,

this dispute does not relate to the terms and provisions of the Sale order and the asset purchase agreement. Accordingly, Defendant's allegation that the bankruptcy court retains jurisdiction over this case is not correct.

D. Transfer the case to the District of New Jersey to its Bankruptcy Court should be denied.

As to the transfer the case from this Court to the Bankruptcy court, section 28 U.S.C. § 1412 is applicable for transfers of "a case or proceeding under title 11". This case is not a bankruptcy case under title 11, accordingly 28 U.S.C. § 1412 is not applicable here. Thus, the transfer to the Bankruptcy court should be denied.

IV. CONCLUSION

For the foregoing reasons, Plaintiff respectfully requests this court to deny Defendant's Motion to Dismiss Plaintiff's and grant Plaintiff any and all relief either in law or equity that this court deems just.

Dated: September 16, 2024

Respectfully submitted,



ANTHONY MITCHELL, Pro se

CERTIFICATE OF SERVICE

I CERTIFY that on September 18, 2024, I caused a true and correct copy of the foregoing PLAINTIFF'S OPPOSITION TO DEFENDANT BEYOND, INC.'S (F/K/A OVERSTOCK.COM, INC.) MOTION TO DISMISS PLAINTIFF'S COMPLAINT AND, IN THE ALTERNATIVE, MOTION TO TRANSFER to be filed with the Clerk of the Court and serving on all parties of record via email as follows:

Todd L. Bice, Esq.
TLB@pisanellibice.com
Emily A. Buchwald, Esq.
EAB@pisanellibice.com
400 South 7th Street, Suite 300
Las Vegas, Nevada 89101
Telephone: (702) 214-2100

Eric R. Swibel
LATHAM & WATKINS LLP
330 North Wabash Avenue, Ste. 2800
Chicago, Illinois 60611
Telephone: (312) 777-7185
Eric.Swibel@lw.com

Dated: September 16, 2024

Respectfully submitted,



ANTHONY MITCHELL, Pro se

Exhibit A

Search for case by number, title, court...

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🔍 Case Details

◀ Previous

1 of 1

Next ▶

ANTHONY MITCHELL v RYAN COHEN, AN INDIVIDUAL, ET AL.

(1) Contacts

Reference ID: Bed Bath And Beyond

Submitted: 08/03/24

Case #: 2:24-CV-01042-RFB-DJA

Documents Category: Summons

Party to Serve: Ryan Cohen

Type: Serve Only

1114 Avenue of the Americas Fl 32, New York, NY 10036

Court: US District Court, Nevada,

Status: Non-Served - Disallowed

Party to Serve: Sue E Grove

4408 Long Champ Dr Apt 38, Austin, TX 78746

Status: Non-Served - Other

Party to Serve: 20230930-DK-butterfly Inc

28 LIBERTY STREET C T CORPORATION SYSTEM (floor 42), new york,
NY 10005

Status: Served

Party to Serve: RC Ventures

1114 Avenue of the Americas Fl 32, New York, NY 10036

Status: Non-Served - Disallowed

Party to Serve: The Depository Trust and Clearing Corporation

11 Times Sq Ste 14, New York, NY 10036

Status: Non-Served - Disallowed

Party to Serve: Overstock.com Inc, doing business as Bed Bath and
Beyond

12670 High Bluff Dr, San Diego, CA 92130

Status: Served

Status Overview

Key Events

- ✓ Served Overstock.com Inc, doing business as Bed Bath and Beyond Proof Signed (8/7/24)
- ✓ Served 20230930-DK-butterfly Inc Proof Signed (8/7/24)

Status Updates & Activity

08/29/24 1:11 PM



Signed Proof of Non-Service for RC Ventures at 1114 Avenue of the Americas Fl 32, New York, N

08/29/24 1:11 PM



Signed Proof of Non-Service for Ryan Cohen at 1114 Avenue of the Americas Fl 32, New York, N

08/27/24 9:32 AM



Action Needed: Choose next service address for RC Ventures

Progress is paused while waiting for customer's response. Expires 10/26/2024.

→ Choose Address

Current address for RC Ventures is not servable.

Bad addresses:

1114 Avenue of the Americas Fl 32, New York, NY 10036 Reason: Disallowed

1114 Avenue of the Americas Fl 32, New York, NY 10036 Reason: Disallowed

08/27/24 9:32 AM



Non-service confirmed for RC Ventures at 1114 Avenue Of The Americas Fl 32, New York, NY 10

Disallowed

08/27/24 9:31 AM

I spoke with an individual who identified themselves as the security and they stated service not via security

Server:  Avatar Neal

08/27/24 9:28 AM



Service attempted upon **Ryan Cohen** at 1114 Avenue Of The Americas Fl 32, New York, NY 1003

I spoke with an individual who identified themselves as the security and they stated service not via security

Server:  Avatar Neal

08/21/24 12:07 PM



Service attempted upon **RC Ventures** at 1114 Avenue Of The Americas Fl 32, New York, NY 1003

I spoke with an individual who identified themselves as the security and they stated subject reside

Server:  Avatar Neal

08/21/24 12:07 PM



Service attempted upon **Ryan Cohen** at 1114 Avenue Of The Americas Fl 32, New York, NY 1003

I spoke with an individual who identified themselves as the security and they stated subject reside

Server:  Avatar Neal

08/20/24 6:38 AM



Service attempted upon **RC Ventures** at 1114 Avenue Of The Americas Fl 32, New York, NY 1003

I spoke with an individual who identified themselves as the security and they stated subject reside

Server:  Avatar Neal

08/20/24 6:37 AM



Service attempted upon **Ryan Cohen** at 1114 Avenue Of The Americas Fl 32, New York, NY 1003

I spoke with an individual who identified themselves as the security and they stated subject reside



Documents dispatched to process server for Ryan Cohen at 1114 Avenue of the Americas Fl 32,

SUMMONS and COMPLAINT

08/13/24 9:56 AM



Documents dispatched to process server for RC Ventures at 1114 Avenue of the Americas Fl 32

SUMMONS and COMPLAINT

08/13/24 9:14 AM



Signed Proof of Non-Service for Sue E Grove at 4408 Long Champ Dr Apt 38, Austin, TX 78746

08/13/24 8:54 AM



Action Needed: Choose next service address for Sue E Grove

Progress is paused while waiting for customer's response. Expires 10/12/2024.

→ Choose Address

Current address for Sue E Grove is not servable.

Bad address:

4408 Long Champ Dr Apt 38, Austin, TX 78746 Reason: Other

08/13/24 8:54 AM



Non-service confirmed for **Sue E Grove** at 4408 Long Champ Dr Apt 38, Austin, TX 78746-1187

Other

08/12/24 6:55 PM



Service attempted upon **Sue E Grove** at 4408 Long Champ Dr Apt 38, Austin, TX 78746-1187

I was unable to access the address due to gated community. No access per security guard.

Server:  Kelly Land

08/12/24 11:23 AM



Message from  Travis Dahl

08/10/24 8:15 AM



Service attempted upon **Sue E Grove** at 4408 Long Champ Dr Apt 38, Austin, TX 78746-1187

I was unable to access the address due to gated community. No access per security guard.

Server:  Kelly Land

08/09/24 6:13 PM



Signed Proof of Non-Service for Ryan Cohen at 1114 Avenue of the Americas Fl 32, New York, N

08/09/24 1:24 PM



Action Needed: Choose next service address for Ryan Cohen

Current address for Ryan Cohen is not servable.

Bad address:

1114 Avenue of the Americas Fl 32, New York, NY 10036 **Reason:** No such address

08/09/24 1:24 PM



Non-service confirmed for **Ryan Cohen** at 1114 Avenue Of The Americas Fl 32, New York, NY 100

No such address

08/09/24 1:22 PM



Service attempted upon **Ryan Cohen** at 1114 Avenue Of The Americas Fl 32, New York, NY 1003

I was unable to locate the address. Please be mindful because this service is not adding up. The
at the address. The address is a multi unit business commercial building. No one resides here!!!
COMMERCIAL BUILDING. SUBSTITUTE SERVICE IS NOT ALLOWED AT BUSINESS LOCATION.
Non Service!!

Server:  Ismael Eldeweuk

08/09/24 1:17 PM



Service attempted upon **Ryan Cohen** at 1114 Avenue Of The Americas Fl 32, New York, NY 1003

I was unable to access the address due to secured building although I contacted apartment office
because this service is not adding up. The service says that subject resides at the address. The
commercial building. No one resides here!!! Once again THIS IS A COMMERCIAL BUILDING. SUE

In addition to the concerns that i raised earlier
The service of process for 20230930-DK-butterfly Inc has not been
signed, can you please correct this so that i can submit it to the
court

08/07/24 6:24 PM



Message from (AM) anthony mitchell

yes i still need RC Ventures and Ryan Cohen served

08/07/24 6:17 PM



Message from (TD) Travis Dahl

Hi Ryan,

While reviewing our chat, I noticed something that will need clarification. Please clarify if you are attempting service on RC Ventures and Ryan Cohen at the address provided and are requesting or would like to have the address reattempted after providing the server with more clear instruct

Thank you,

Travis Dahl
ABC Legal Customer Success Team

08/07/24 6:12 PM



Message from (TD) Travis Dahl

Hi Anthony,

Thank you for reaching out to us in chat today. We will review your request and get back to you s

Thank you,

Travis Dahl
ABC Legal Customer Success Team

08/07/24 11:05 AM



Signed Proof of Service upon Overstock.com Inc, doing business as Bed Bath and Beyond

08/07/24 10:37 AM



Service completed upon Overstock.com Inc, doing business as Bed Bath and Beyond at 12670 I

Service attempted upon **Sue E Grove** at 4408 Long Champ Dr Apt 38, Austin, TX 78746-1187

I was unable to access the address due to gated community. Security guard said to contact own

Server:  Kelly Land

08/06/24 3:54 PM



Process server received documents for 20230930-DK-butterfly Inc

Server:  Ismael Eldeweuk

08/06/24 3:29 PM



Signed Proof of Non-Service for The Depository Trust and Clearing Corporation at 11 Times Sq S

08/06/24 3:29 PM



Signed Proof of Non-Service for RC Ventures at 1114 Avenue of the Americas Fl 32, New York, N

08/06/24 3:29 PM



Signed Proof of Non-Service for 20230930-DK-butterfly Inc at 780 3rd AVENUE 34th floor, NEW Y

08/06/24 1:07 PM



anthony mitchell chose next service address for 20230930-DK-butterfly Inc

Newly Selected Address:

28 LIBERTY STREET C T CORPORATION SYSTEM (floor 42), new york, New York County, NY 100

08/06/24 12:19 PM



Action Needed: Choose next service address for The Depository Trust and Clearing Corporation

Progress is paused while waiting for customer's response. Expires 10/5/2024.

→ Choose Address

Current address for The Depository Trust and Clearing Corporation is not servable.

Bad address:

11 Times Sq Ste 14, New York, NY 10036 Reason: Disallowed

Current address for RC Ventures is not servable.

Bad address:

1114 Avenue of the Americas Fl 32, New York, NY 10036 Reason: Disallowed

08/06/24 11:53 AM



Non-service confirmed for **RC Ventures** at 1114 Avenue Of The Americas Fl 32, New York, NY 10036

Disallowed

08/06/24 11:53 AM



Service attempted upon **RC Ventures** at 1114 Avenue Of The Americas Fl 32, New York, NY 10036

I spoke with an individual who identified themselves as the person authorized to accept and they

Server:  Ismael Eldeweuk

08/06/24 11:20 AM



Action Needed: Choose next service address for 20230930-DK-butterfly Inc

✓ Resolved on 08/06/24

Current address for 20230930-DK-butterfly Inc is not servable.

Bad address:

780 3rd AVENUE 34th floor, NEW YORK, NY 10017 Reason: Unknown

08/06/24 11:19 AM



Non-service confirmed for **20230930-DK-butterfly Inc** at 780 3rd Ave Fl 34, New York, NY 10017-2003

Unknown

08/06/24 11:18 AM



Service attempted upon **20230930-DK-butterfly Inc** at 780 3rd Ave Fl 34, New York, NY 10017-2003

I spoke with an individual who identified themselves as the corporate officer and they stated sub

Server:  Ismael Eldeweuk

Server:  Ismael Eldeweuk

08/05/24 2:25 PM



Process server received documents for 20230930-DK-butterfly Inc

Server:  Ismael Eldeweuk

08/05/24 12:28 PM



Service attempted upon Sue E Grove at 4408 Long Champ Dr Apt 38, Austin, TX 78746-1187

I placed a phone call to number ending in 2816 resulting in leaving voice mail.

Server:  Kelly Land

08/05/24 12:28 PM



Service attempted upon Sue E Grove at 4408 Long Champ Dr Apt 38, Austin, TX 78746-1187

I placed a phone call to number ending in 1714 resulting in leaving voice mail.

Server:  Kelly Land

08/05/24 12:20 PM



Service attempted upon Sue E Grove at 4408 Long Champ Dr Apt 38, Austin, TX 78746-1187

I was unable to access the address due to gated community. No access per security guard. Need to enter. This is a community within the Austin Country Club and it's an exclusive, members only area.

Server:  Kelly Land

08/05/24 9:17 AM



Process server received documents for Sue E Grove

Server:  Kelly Land

08/05/24 6:02 AM



Filing confirmed. Case # 2:24-CV-01042-RFB-DJA filed on 06/26/24 at US District Court, Nevada.

4408 Long Champ Dr Apt 38, Austin, TX 78746

Physical Description / Helpful Notes

Individual, residential address, Gated neighborhood, Townhouse

RC Ventures

1114 Avenue of the Americas Fl 32, New York, NY 10036

Physical Description / Helpful Notes

Marisa Antonelli Vinson & Elkins LLP - Counsel Representing RC Ventures

Overstock.com inc, doing business as Bed Bath and Beyond

12670 High Bluff Dr, San Diego, CA 92130

Physical Description / Helpful Notes

Latham & Watkins LLP Dennis M. Benschoter - Counsel Representing Overstock (Beyond inc)

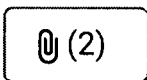
The depository trust and clearing corporation

11 Times Sq Ste 14, New York, NY 10036

Physical Description / Helpful Notes

Margaret A. Dale

PROSKAUER ROSE LLP - attorney representing The depository trust and clearing corporation



Requestor
anthony mitchell

 Documents

 Invoices

 Support

Need Help?

Create a customer support ticket.

Please explain the issue and a member of our team will follow up.

Hello Anthony,

Thank you for providing this additional information. I am reaching out for additional information on this to have an update for you shortly.

Kindly,
Summer Burrows
ABC Legal Customer Support

AM

anthony m. Aug 7, 2024 6:24 PM

In addition to the concerns that i raised earlier
The service of process for 20230930-DK-butterfly Inc has not been
signed, can you please correct this so that i can submit it to the
court

AM

anthony m. Aug 7, 2024 6:24 PM

yes i still need RC Ventures and Ryan Cohen served

TD

Travis D. Aug 7, 2024 6:17 PM | ABC Legal Customer Support

Hi Ryan,

While reviewing our chat, I noticed something that will need clarification. Please clarify if you are attempting service on RC Ventures and Ryan Cohen at the address provided and are requesting or would like to have the address reattempted after providing the server with more clear instructions.

Thank you,

Travis Dahl
ABC Legal Customer Success Team

TD

Travis D. Aug 7, 2024 6:12 PM | ABC Legal Customer Support

Hi Anthony,

Thank you for reaching out to us in chat today. We will review your request and get back to you shortly.

Thank you,

Travis Dahl
ABC Legal Customer Success Team